

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z., Alexander
MARTINEZ HERNANDEZ, on behalf of
themselves as individuals and on behalf of
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES; Ur JADDOU, Director, U.S.
Citizenship and Immigration Services;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; David NEAL,
Director, Executive Office for Immigration
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &
STIPULATION**

STIPULATION - 1
2:22-cv-00806-JHC

United States Department of Justice, Civil Division
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PARTIES' JOINT STATUS REPORT AND STIPULATION

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services; Ur Jaddou, Director, U.S. Citizenship and Immigration Services; Executive Office for Immigration Review; and David L. Neal, Director, Executive Office for Immigration Review, hereby stipulate to an additional 75-day stay of proceedings as the parties continue their settlement discussions.

Plaintiffs and Defendants previously jointly stipulated to one 60-day stay and one 90-day stay in order to explore settlement possibilities. *See* ECF Nos. 34, 37. On June 27, 2022, this Court issued an order granting the 60-day stay and ordering the parties to submit a joint status report on August 29, 2022. ECF No. 35. Plaintiffs and Defendants held a settlement conference on August 3, 2022, where they discussed the claims for the putative classes and agreed that there was potential for resolving many, if not all of the claims without the need of further litigation. Defendants requested Plaintiffs follow up with a written framework providing general parameters for resolving the claims. Plaintiffs submitted a document with a proposed settlement framework to Defendants on August 12, 2022.

On August 29, 2022, the parties submitted a joint status report and stipulation detailing their ongoing efforts to reach settlement in this case and requested a 90-day stay to further engage in settlement discussions and conserve judicial resources, as well as those of the parties. ECF No. 37. On August 30, 2022, this Court issued an order granting the 90-day stay and ordering the parties to submit a joint status report on November 28, 2022. *See* ECF No. 37. Accordingly, Plaintiffs and Defendants submit the following update on the status of their settlement talks:

On October 14, 2022, Defendants provided written responses to Plaintiffs' proposed settlement framework. On October 26, 2022, the parties held a settlement conference where they discussed Defendants' responses, potential terms for settlement, and the possibility of resolving

1 this matter without further litigation. Defendants requested that Plaintiffs provide written feedback
2 to Defendants' settlement responses, and Plaintiffs' have agreed to provide their written feedback
3 by November 29, 2022.

4 In light of these developments in the settlement discussions, the parties now stipulate to a
5 75-day extension. Good cause exists for the stipulation because the complexity of the issues in this
6 case requires additional time and there continues to be a meaningful opportunity to reach a
7 settlement that would conserve judicial resources, as well as those of the parties.

8 The parties respectfully request an order from the Court further staying Defendants'
9 responsive deadlines and setting a deadline for a joint status report for February 13, 2023, 75 days
10 from today's date.¹ At that time, the parties will provide the Court with an update on the status of
11 settlement talks and, if applicable, any proposed deadlines.

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14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 Dated this ____ day of ____.

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24 ¹ A 75-day stay would set the parties' deadline to file their joint status report on Saturday, February
25 11, 2023. Pursuant to Federal Rule of Civil Procedure 26(a)(1)(c), the parties' new deadline would
fall on Monday, February 13, 2023. Fed. R. Civ. Pro. 26(a)(1)(c).

1 For the Plaintiffs:

2 /s/ Matt Adams

3 Matt Adams
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9 /s/ Aneesa Ahmed

10 Aneesa Ahmed
11 Trial Attorney
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18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated this 29th day of November.

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22 The Honorable John H. Chun
23 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that, on November 28, 2022, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter.

Dated: November 28, 2022

/s/ Aneesa Ahmed

Aneesa Ahmed